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Environmental Services
Waste Management
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Special Structures
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June 13, 1988
60251

Ms. Karen Waldvogel, RPM
CERCLA Enforcement
Illinois/Indiana Unit
U.S. EPA, Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Review Comments
Work Plan, dated April 1988
American Chemical Services RI/FS Site
Griffith, Indiana

Dear Ms. Waldvogel:

In phone conversation with on May 5, 1988, you listed the following items in review of the final draft of the ACS RI/FS Work Plan document, dated April 1988:

<u>Review Comment</u>	<u>Line</u>	<u>Page</u>
Figure 2-2 was not included with U.S. EPA copy.	26	2-2 of 9
Add "potential" following "primary"	14	2-7 of 9
Change "may" to "shall"	5	3-3 of 8
Delete last sentence in #2	8-9	3-7 of 8
Delete "final"	16	4-6 of 36
Change wording to include an upgradient well in the upper aquifer if one exists	27	4-12 of 36
Insert "or requirements" after "laws"	17	5-1 of 18
Change "CERCLA" to "CERCLA/SARA"	29	5-9 of 18
Change "CERCLA" to "CERCLA/SARA"	21	5-12 of 18

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Add "DOI (if possible)" after "IDEM"

6

6-1 of 1

Add another surface water and sediment sampling location at the ditch outflow of the landfill.

Figure 4-3

Each of these comments has been considered by Mr. Andrew Perellis and other members of the technical subcommittee of the ACS PRP group and by Warzyn Engineering Inc. It is the consensus that most of the comments address wording changes which would not substantively change the scope of work and therefore do not warrant changes in the Work Plan.

Two of the comments, the first and the last, do appear to have significance to the overall work plan. With respect to the first comment, Figure 2-2 was apparently inadvertently left out of the U.S. EPA copy of the Work Plan. A copy has since been mailed to you.

The last comment, to add a surface water sampling location south of the landfill, was apparently in response to the letter dated December 4, 1987 from David Hudak, of the Department of the Interior. It is not felt that this location needs to be added to the work plan for 2 reasons. First, the result of adding that location would be to increase to 12, the number of Phase I surface water and sediment sampling locations. This is one more location than specified in the original U.S. EPA work plan developed by Roy F. Weston (dated March 1987). The 11 locations shown on Figure 4-3 are identical to the locations specified in that original U.S. EPA work plan.

The second reason is that the Warzyn Work Plan is sufficiently flexible to allow the addition of that location (and possibly other sampling locations) in the second phase of investigation if it were found to be necessary. From Warzyn's site visit, it appeared that the location, south of the landfill, is not at present, a surface water location because of de-watering activities at the landfill.

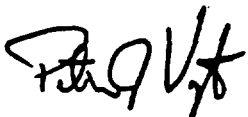
Warzyn recommends that this, and other possible questions of sampling locations be resolved by conducting a pre-mobilization site visit. The meeting would be scheduled and announced so that representatives of the U.S. EPA, IDEM, DOI, the PRP group, and the PRP's consultant could attend. The purpose of the meeting would be to arrive at a consensus regarding the optimal locations for each of the waste, soil, sediment, surface water, and groundwater sampling locations for Phase I of the investigation.

Karen Waldvogel
June 13, 1988
Page 3

It is hoped that this letter adequately addresses the concerns of the U.S. EPA. If you have any questions or further comments, please call us at 312/773-8484.

Respectfully Submitted,

WARZYN ENGINEERING INC.



Peter J. Vagt, Ph.D.
Project Coordinator

cc: Andrew Perellis, Esq.

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